

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JENNIFER ECKHART,

Plaintiff,

v.

FOX NEWS NETWORK, LLC and ED HENRY,  
in his individual and professional capacities,

Defendants.  
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Case No. 1:20-cv-05593 (RA) (GWG)

**DECLARATION OF  
MICHAEL J. WILLEMIN**

I, **Michael J. Willemín**, pursuant to 28 U.S.C. §1746, declare and state as follows:

1. I am a Partner at the law firm Wigdor LLP, counsel for Plaintiff Jennifer Eckhart. I have personal knowledge of the facts set forth herein and submit this declaration in opposition to Defendant Fox News Network, LLC's Motion for Summary Judgment and Defendant Ed Henry's Motion for Summary Judgment.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of relevant excerpts from the deposition of Denise Collins on September 7, 2023.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of relevant excerpts from the deposition of [REDACTED] on October 2, 2023.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of relevant excerpts from the deposition of Jennifer Eckhart on April 24, 2023.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of relevant excerpts from the deposition of Gregg Gilman on September 22, 2023.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of relevant excerpts from the deposition of Ed Henry on June 16, 2023.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of relevant excerpts from

the deposition of Andrew Holt on December 11, 2023.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of relevant excerpts from the deposition of Amie Karp on November 29, 2023.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of relevant excerpts from the deposition of Kevin Lord on January 5, 2024.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_000625-636.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_000637-652.

12. Attached hereto as **Exhibit 11** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_002509.

13. Attached hereto as **Exhibit 12** is a true and accurate copy of the Declaration of Jennifer Eckhart dated November 19, 2024.

14. Attached hereto as **Exhibit 13** is a true and accurate copy of the Declaration of

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15. Attached hereto as **Exhibit 14** is a true and accurate copy of the Declaration of

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16. Attached hereto as **Exhibit 15** is a true and accurate copy of the Declaration of Justine Carroll.

17. Attached hereto as **Exhibit 16** is a true and accurate copy of the Declaration of

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18. Attached hereto as **Exhibit 17** is a true and accurate copy of Dkt. No. 38, which is Plaintiffs' Jennifer Eckhart and Cathy Areu's Amended Complaint against Defendants Fox News

Network, LLC, Ed Henry, Sean Hannity, Tucker Carlson and Howard Kurtz, in their individual and professional capacities, dated September 11, 2020.

19. Attached hereto as **Exhibit 18** is a true and accurate copy of relevant docket entries in this action in connection with Cathy Areu.

20. Attached hereto as **Exhibit 33** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 002953.

21. Attached hereto as **Exhibit 35** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000794-804.

22. Attached hereto as **Exhibit 36** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000101.

23. Attached hereto as **Exhibit 37** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000104.

24. Attached hereto as **Exhibit 38** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000111.

25. Attached hereto as **Exhibit 39** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000126.

26. Attached hereto as **Exhibit 40** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001150.

27. Attached hereto as **Exhibit 41** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001183.

28. Attached hereto as **Exhibit 42** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001234.

29. Attached hereto as **Exhibit 43** is a true and accurate copy of a document produced

by Plaintiff and Bates stamped PL\_F 001249.

30. Attached hereto as **Exhibit 44** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001251-53.

31. Attached hereto as **Exhibit 45** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001260.

32. Attached hereto as **Exhibit 46** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001268.

33. Attached hereto as **Exhibit 47** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001270.

34. Attached hereto as **Exhibit 48** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001272.

35. Attached hereto as **Exhibit 49** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 002013-14.

36. Attached hereto as **Exhibit 50** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 003342.

37. Attached hereto as **Exhibit 53** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000924.

38. Attached hereto as **Exhibit 54** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000959.

39. Attached hereto as **Exhibit 55** is a true and accurate copy of a document produced by Defendant Ed Henry and Bates stamped HENRY-847-848.

40. Attached hereto as **Exhibit 56** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000927.

41. Attached hereto as **Exhibit 57** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000934.

42. Attached hereto as **Exhibit 58** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000931.

43. Attached hereto as **Exhibit 59** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000928.

44. Attached hereto as **Exhibit 60** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000935.

45. Attached hereto as **Exhibit 61** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000923-925.

46. Attached hereto as **Exhibit 62** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_H 000930-932.

47. Attached hereto as **Exhibit 63** is a true and accurate copy of a document produced by Defendant Henry and Bates stamped HENRY-785-808.

48. Attached hereto as **Exhibit 64** is a true and accurate copy of a document produced by Defendant Henry and Bates stamped HENRY-825.

49. Attached hereto as **Exhibit 65** is a true and accurate copy of a document produced by Defendant Henry and Bates stamped HENRY-826.

50. Attached hereto as **Exhibit 66** is a true and accurate copy of a document produced by Defendant Henry and Bates stamped HENRY-25.

51. Attached hereto as **Exhibit 67** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000794 .

52. Attached hereto as **Exhibit 68** is a true and accurate copy of a document produced

by Plaintiff and Bates stamped PL\_F 000791.

53. Attached hereto as **Exhibit 69** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000792.

54. Attached hereto as **Exhibit 70** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 000793.

55. Attached hereto as **Exhibit 71** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_002509.

56. Attached hereto as **Exhibit 72** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 002667 and PL\_F 002661.

57. Attached hereto as **Exhibit 73** is a true and accurate copy of a document produced by Plaintiff and Bates stamped 002678-2679.

58. Attached hereto as **Exhibit 74** is a true and accurate copy of a document produced by Real America's Voice and Bates stamped ARV\_0000001-17.

59. Attached hereto as **Exhibit 75** is a true and accurate copy of a document produced by Defendant Henry and Bates stamped HENRY-809-823.

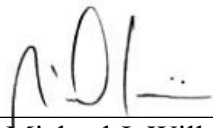
60. Attached hereto as **Exhibit 76** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_000001-3.

61. Attached hereto as **Exhibit 77** is a true and accurate copy of a document produced by Defendant Fox News and Bates stamped FOX\_000004-7.

62. Attached hereto as **Exhibit 78** is a true and accurate copy of a document produced by Plaintiff and Bates stamped PL\_F 001161.

63. I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: November 19, 2024  
New York, New York

By:   
Michael J. Willemijn